

**IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF NEW JERSEY  
(Camden Vicinage)**

<b>ANGELA READING,</b>	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	Case No. 1:23-cv-01469-KWM-EAP
<b>ROBERT DUFF</b> , in his individual and official	)	
capacities, et al.,	)	
	)	
Defendants.	)	

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**PLAINTIFF’S MOTION FOR A PRELIMINARY  
INJUNCTION PURSUANT TO FED. R. CIV. P. 65(a)**

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**PLEASE TAKE NOTICE** that on a date to be fixed by the Court, and before the Honorable Karen M. Williams, U.S.D.J., Plaintiff Angela Reading, by and through their undersigned counsel will, and hereby does, move this Court, pursuant to Fed. R. Civ. P. 65(a), for a preliminary injunction:

(1) prohibiting Defendants, their successors in office, and all those acting in concert with them, from acting in the course of their official duties to:

- (i) censor;
- (ii) attempt to censor;
- (iii) direct or pressure others to censor;
- (iv) “threat-tag” or designate as “stochastic terrorism” or its equivalent;
- (v) refer to law enforcement or security agencies; or
- (vi) otherwise take any official action or permit the existence or continuation of any official policy or practice involving adverse action against Plaintiff’s or

others' protected speech not constituting a true threat or incitement to violence as defined by controlling Supreme Court precedent;

(vii) adopt any policy or practice that would violate restrictions (i)-(vi); and

(2) requiring Defendants to undergo regular First Amendment training to ensure compliance with this injunction.

In support of her motion, Plaintiff relies upon the First Amended Complaint and the Exhibits thereto (ECF Doc. 32), and the Unsworn Supplemental Declaration of Plaintiff Angela Reading and the Exhibits thereto; the Unsworn Declaration of Nicole Stouffer; and the Supporting Memorandum of Law, all being electronically filed herewith.

Dated: May 4, 2023

Respectfully submitted,

/s/ Christopher A. Ferrara  
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\**Pro Hac Vice* motion filed

/s/ B. Tyler Brooks  
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Defendants.	)	

**CERTIFICATE OF SERVICE**

I, Christopher A. Ferrara, Special Counsel to The Thomas More Society, do hereby certify that on this 4<sup>th</sup> day of May 2023, the Plaintiff's Motion for a Preliminary Injunction; Supplemental Declaration of Angela Reading and Exhibits; Declaration of Nicole Stouffer; supporting Memorandum of Law and Proposed Order were served on the attorneys for Defendants Payne, Schilling and Duff by ECF on May 4, 2023. The attorneys for all military defendants will be served by Federal Express on May 5, 2023 with a separate Certificate of Service to follow.

Dated: May 4, 2023

s/ Christopher A. Ferrara  
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